

CARLA SANDERSON

ATTORNEY NY, NJ, SDNY, EDNY

260 MADISON AVENUE FL 22
NEW YORK, NEW YORK 10016
carla@carlasandersonlaw.com

T 646.499.3818
F 646.499.3814
carlasandersonlaw.com

June 30, 2019

Via ECF

William Campos
Assistant United States Attorney
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Roman Guevara*, 18-CR-85 (MKB)

Dear Mr. Campos,

I represent defendant Roman Guevara in the above captioned case. I respectfully submit this letter to demand Discovery pursuant to Fed. R. Crim. Pro. 16 ("Rule 16 Discovery"). Specifically, this demand pertains to the government's February 5, 2019 Discovery production. The materials produced do not contain BATES stamps, and it is respectfully requested that the government produce a BATES stamped version of this discovery. BATES numbers are necessary as they enable counsel to determine whether all discovery referenced in the government's letter has been provided. In addition, counsel has been unable to open certain files in the Bank of America folders, and some of the folders appear to be empty.

Thank you for your attention to this matter.

Respectfully submitted,

/s

Carla M. Sanderson, Esq.
Attorney for Roman Guevara
260 Madison Avenue, Flr. 22
New York, New York 10016
t 646.499.3818
f 646.499.3814
Carla@carlasandersonlaw.com